

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

UNITED STATES OF AMERICA)
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)
)
v.) No. 3:14-00076
) Chief Judge Haynes
)
)
RAYMOND WILSON)

**MOTION TO ENLARGE TIME WITHIN WHICH TO FILE PRETRIAL
MOTIONS AND TO CONTINUE PLEA DEADLINES, CONFERENCES AND TRIAL**

COME NOW the Defendant, Raymond Wilson, by and through his undersigned counsel, and respectfully request that this Honorable Court enter an Order: (1) enlarging the time within which the Defendant has to file pretrial motions (including pretrial motions requiring an evidentiary hearing) from June 24, 2014 to, and including, forty-five (45) days prior to the trial of the above-captioned matter; (2) enlarging the plea related deadlines to thirty (30) days prior to the next trial setting, consistent with the Court's standard Order; (3) rescheduling the plea hearing or status conference with the Court to a date three (3) weeks prior to trial; and, (4) continuing the trial of this case from Tuesday, August 5, 2014 to a date no earlier than Tuesday, November 4, 2014.

In support hereof, Defendant Wilson states as follows:

1. Defendant Raymond Wilson made his Initial Appearance in this District on May 15, 2014. On June 5, 2014, this Honorable Court entered an Order: (1) scheduling this case for its first trial setting on Tuesday, August 5, 2014; (2) setting a deadline for filing Motions requiring an evidentiary hearing of June 24, 2014; (3) setting a plea consummation deadline of July 18, 2014; and, (4) setting a plea hearing and status conference for July 21, 2014.
2. Counsel has not yet received the complete discovery materials from the government. Until the entire initial production of discovery is received, undersigned counsel will be unable to